

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
Plaintiff)	
)	
v.)	No. 07 CR 851-2
)	Honorable Robert W. Gettleman
Salvador GARCIA)	
Defendant)	

MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS

Defendant Salvador GARCIA, by his attorney Steven R. Shanin, respectfully moves this Court to grant leave to file additional motions after the April 15, 2008 pretrial motions cutoff date. The Assistant United States Attorney has, pursuant to Rule 16.1 delivered or made available to defendant and his counsel certain discovery materials, including Orders and Applications for Wire Communications Intercepts. The sheer volume of surveillance videos and monitored conversations (contained on 12 DVD's), equates to many hours of review and research before certain pretrial motions can be properly framed. Rather than requesting a date certain by which to file additional pretrial motions, defendant is requesting leave to file such additional motions as may be warranted as the tendered discovery is evaluated and additional discovery is tendered.

Additionally, defendant GARCIA, who is being held at the old Kankakee jail does not speak English. Therefore, after undersigned counsel's review of the discovery materials, undersigned counsel must travel to Kankakee with a translator to meet with defendant. Undersigned counsel will be out of the area between April 5, 2008 and April 13, 2008 and unable to meet with defendant during that time.

WHEREFORE, defendant Salvador GARCIA respectfully requests that this Court enter

an order granting defendant leave to file additional motions.

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Respectfully Submitted,

s/Steven R. Shanin
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